

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

LEAGUE OF UNITED LATIN AMERICAN
CITIZENS (LULAC), et al.,

Plaintiffs,

v.

GREG ABBOTT, et al.,

Defendants.

Civil Action No. 3:21-cv-259
(DCG-JES-JVB)
(consolidated cases)

**UNITED STATES' UNOPPOSED MOTION TO EXTEND TIME
TO FILE MOTION TO COMPEL PRODUCTION OF DOCUMENTS FROM
TEXAS LEGISLATIVE COUNCIL**

Pursuant to Federal Rule of Civil Procedure 6(b), the United States respectfully requests that the Court extend by two weeks the United States' time to move to compel the production of documents from the Texas Legislative Council ("TLC"). TLC produced a privilege log in response to the United States' subpoena *duces tecum* on September 16, 2022. The requested two-week extension would make the United States' motion to compel due on October 31, 2022. *See* ESI Order ¶ IX.B.5, ECF No. 203.¹ Respondent does not oppose this motion.

The United States does not seek this extension for purposes of delay. Rather, this extension will allow the parties to continue to confer and narrow areas of disagreement. Therefore, good cause exists to grant this motion and Respondent will not be prejudiced by the requested relief. Accordingly, the United States respectfully requests that the Court grant this

¹ This provision specifies a deadline to file any motion to compel challenging a privilege log that is "produced less than 30 days before the close of discovery." Thus, although this provision does not expressly apply to TLC's privilege log—produced long after the July 15, 2022 close of discovery—the United States files this motion to ensure clarity as to its filing deadline for any motion to compel.

motion and extend to October 31, 2022, the deadline to move to compel the production of documents related to TLC's September 16, 2022 privilege log. A proposed order is attached.

Dated: October 14, 2022

ELISE C. BODDIE
Principal Deputy Assistant Attorney General
Civil Rights Division

/s/ Jasmin Lott
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CERTIFICATE OF CONFERRAL

I hereby certify that on October 13, 2022, counsel for the United States conferred with counsel for Texas Legislative Council concerning the subject of this motion. Counsel for Texas Legislative Council does not oppose the relief sought.

/s/ Jasmin Lott
Jasmin Lott
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CERTIFICATE OF SERVICE

I hereby certify that on October 14, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of this filing to counsel of record.

/s/ Jasmin Lott
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